

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:

Accelerating Wireless Broadband Deployment	)	WT Docket No. 17-79
by Removing Barriers to Infrastructure Investment	)	
	)	
Accelerating Wireline Broadband Deployment	)	WC Docket No. 17-84
by Removing Barriers to Infrastructure Investment	)	
	)	
	)	
	)	

To:   Office of the Secretary  
      Federal Communications Commission

Comments Submitted By:

Consumers for Safe Cell Phones  
Cynthia Franklin, President  
520 Ridgeway Drive  
Bellingham, WA 98225

Consumers for Safe Cell Phones is a 501C3 non-profit organization. I, Cynthia Franklin, attest that my statements are true to the best of my knowledge.

The FCC is mandated to protect American citizens from the known hazards of microwave radiation exposure. Nowhere is it stated that the FCC's function is to facilitate deployment of infrastructure for the sole purpose of enhancing the telecom industry's profit-making potential.

This proceeding is an egregious ploy to circumvent the democratic process; clearly this level of law-making is to be undertaken by Congress as representatives of the people – not by a federal agency that has become aligned with the industry it is mandated to regulate.

Paragraph 128 states,

*Industry commenters contend that the shot clocks should apply to all authorizations a locality may require, and to all aspects of and steps in the siting process, ...Local siting authorities, on the other hand, argue that a broad application of Section 332 will harm public safety and welfare by not giving them enough time to evaluate whether a proposed deployment endangers the public. They assert that building and encroachment permits should not be subsumed within the shot clocks because these permits incorporate essential health and safety reviews. After carefully considering these arguments, we find that “any request for authorization to place, construct, or modify personal wireless service facilities” under Section 332(c)(7)(B)(ii) means all authorizations necessary for the deployment of personal wireless services infrastructure. This interpretation finds support in the record and is consistent with the courts’ interpretation of this provision and the text and purpose of the Act.*

It is crucial to point out the fallacy of this legal argument as it relies upon the faulty assumption that current federal health/safety regulations (i.e.; FCC's microwave radiation exposure guidelines) are adequate to protect the public from the known biological hazards of this exposure.

The following facts render FCC's health/safety regulations obsolete and not protective of public health:

1. The current guidelines are over 22 years old and are based upon the obsolete scientific view that the only biological harm from microwave radiation exposure results from the heating of human tissue. This is no longer the prevailing view of the independent, non industry-funded scientists who have done the most research studying the biological effects from wireless radiation exposure; a growing body of published, peer-reviewed studies show harmful biological effects at levels hundreds and thousands of times below the current guidelines, including male fertility impairment, DNA damage, cellular oxidation, miscarriages, behavioral problems suffered by children exposed in the womb, as well as cancer and other debilitating illnesses.
2. In the GAO 2012 REPORT – “TELECOMMUNICATIONS: Exposure and Testing Requirements for Mobile Phones Should Be Reassessed” - GAO-12-771: Published: Jul 24, 2012 – the following recommendation was directed:

*Recommendation: The Chairman of the FCC should formally reassess the current RF energy exposure limit, including its effects on human health, the costs and benefits associated with keeping the current limit, and the opinions of relevant health and safety agencies, and change the limit if determined appropriate.*

In spite of the recommendation of this 2012 GAO report to reassess the 22 year old guidelines, **the FCC has not issued any further actions in Dockets 13-84 or 03-137 and does not have a schedule to resolve the issues in the open proceeding.**

3. In 2011, wireless microwave radiation exposure was declared a possible human carcinogen by the International Agency for Research on Cancer based upon an increased risk in brain cancer in those who were exposed for 30 minutes a day for 10 or more years – exposure to consumer devices that were compliant with FCC’s guidelines: ([http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf))
4. The panel of experts who were convened in March to analyze the data from the U.S. NTP study evaluated all the results and determined that there was “clear evidence of” cancer – giving the study’s findings the highest level of scientific certainty: ([https://ntp.niehs.nih.gov/ntp/about\\_ntp/trpanel/2018/march/peerreview20180328\\_508.pdf](https://ntp.niehs.nih.gov/ntp/about_ntp/trpanel/2018/march/peerreview20180328_508.pdf)) ...yet **the FCC turns a blind eye to this blinking red warning light, charging ahead with their wireless industry-friendly, economic-fueled drive to fast-track the deployment of 5G – all in the name of increasing financial profits for the executives and shareholders (as well as lobbyists) at Verizon, AT&T, Sprint, T-Mobile et al.**

Given the above facts that point to the FCC’s collusion with the wireless industry’s profit motives at the expense of the public health of the American people, it falls upon the responsibility of state and local officials to protect their citizens from this known biological hazard. We strongly oppose the imposition of a “shot clock” to blatantly prevent cities and states from working through the necessary process of assessing the actual costs and public health impacts from the additional exposure to the microwave radiation from 5G deployment to local citizens whose welfare they have a duty to protect.

**For the reasons stated above, we strongly urge the FCC to place a hold on all 5G deployment until the obsolete and inadequate health/safety exposure guidelines can be reassessed to ensure that the public is protected from this carcinogenic exposure.**